

MARTLESHAM NEIGHBOURHOOD PLAN Submission Draft Version Questions to Martlesham Parish Council and Suffolk Coastal District Council into the examination of the Martlesham Parish Neighbourhood Plan

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8 November 2017

Martlesham Parish Neighbourhood Plan - Examiner's Questions.

I should be grateful for further information and clarification on the following matters from the Parish Council and/or Local Planning Authority as appropriate.

1 Paragraph 1.3 states that the NP policies will "replace" some of the saved policies. Would the LPA comment on whether they consider this is a correct interpretation as the policies will only apply in the plan area and will not replace the saved policies elsewhere.

Yes that is our intention. We suggest the addition of "within the Martlesham Neighbourhood Plan Area" to the end of para.13

2 The Policies Map shows an area of housing along Deben Avenue that is outside the Physical Limits boundary. However Suffolk Coastal DC's Map 40 for Kesgrave shows a Physical Limits Boundary around this area. Would you clarify the position please?

We propose the addition of a footnote to Figure 1.1 as follows:-

"Although Deben Avenue is within the physical limits of Kesgrave (as shown in Map 40 in Appendix 6a of the Site Allocations and Area Specific Policies - Development Plan Document January 2017). it is within the Martlesham Neighbourhood Plan area".

3 Would the LPA and QB comment on whether the proposed revisions to paragraphs 2.16 and 2.17 proposed by PRC should be made.

PRC appear to be referring to earlier pre-sub version of the NP. The submission stage version shows 160 in both para 2.19 and para 8.2. That is the correct figure. No change is proposed.

We agree that inadequate parking is a problem primarily associated with the retail park. Retail staff are generally not allowed to park in the retail car parks and as a result their cars radiate out and create a problem in nearby parts of the industrial area. The spread is increasing as the retail park grows.

Para 8.2 4th bullet (was para 8.3 5th bullet in the presubmission version) refers to parking of company vehicles in the industrial area. Most businesses in that area have sufficient off-road parking for their company vehicles plus where necessary some employee and customer parking. There is nonetheless quite a lot of on street parking even in parts of the business area further from the retail area but this does not appear to cause the same problems as on the roads in and near the retail area (which unfortunately tend to be narrower).

We propose no text change

4 Policy MAR3, paragraph 4 refers to "if any existing leisure uses are accessible to the public". Would the QB confirm whether or not there are any such uses and whether the word "if" is necessary?

We agree "if" is not necessary, therefore it would read:-

"Any existing leisure uses on sites accessible to the public should be retained or re-provided in line with Policy MAR9"

The only uses at present on publicly accessible sites are informal eg walking, ball games, etc (with the exception of the Village Green where organised games and village events take place).

5 Would the LPA provide an update on the proposed provision of health care facilities for the expanded population? Is the final paragraph of Policy MAR3 concerning the expansion of the health care facility at The Square deliverable? Would this policy unduly restrict the use of the adjacent land for other uses? It is not clear which land is referred to in paragraph 4.20.

Discussions are still ongoing between the developer, the LPA, CCG, NHS England and the Practice.

It is proposed that the last paragraph be reworded as follows:-

"Any development proposals must demonstrate that they have engaged with the Clinical Commissioning Group in respect of the existing primary healthcare facility. Proposals shall not prejudice the potential for expansion of the existing healthcare unless it is clearly demonstrated that this is not necessary to support the growth proposed in the Neighbourhood Plan area and at the strategic site at Adastral Park during the plan period"

Also reword para 4.20 as follows:-

"Any future planning decisions made in the village centre (as defined in fig 4.1) should take account of the demonstrated need for the future expansion of the healthcare facility"

6 Would the QB provide the evidence to justify the mix of dwellings in Policy MAR5 and the statement in paragraph 5.11 that a significant majority of 2 and 3 bedroomed properties should be sheltered housing, bungalows and flats. With the advent of care in the community sheltered housing is usually developed for a specialised housing need eg in the form of extra care housing. It is not clear what a significant majority of development amounts to or how the housing mix would be applied to small scale infill development. Moreover, the Housing Technical Standards have introduced optional standards in the Buildings Regulations for accessible and adaptable housing. The PPG advises that "Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and/or M4(3) of the op-

tional requirements in the Building Regulations” and this should be supported by evidence of need. I would welcome the LPA’s views on whether the second part of Policy MAR5 can be implemented.

Please see separate document entitled response to Q6

7 Is the area covered by Policy MAR8 the same as that covered by Policy SSP38?

Yes

8 Policy MAR10 refers to walking and cycle linkages to new leisure uses in Adastral Park. Is this an aspirational policy or have routes been identified within the Neighbourhood Plan area?

Routes are already proposed as part of the Adastral Park Transport Assessment linking through to Martlesham Heath and to Old Martlesham. To be secured by condition and S106.

9 Would the QB explain the intention of the second part of Policy MAR12 concerning community growing areas “supporting residential development”. How is this policy to be implemented bearing in mind that the NP only provides for infill development? Should a minimum site threshold be set? If so, what should it be?

The inclusion of the principle of community growing areas aligns with the current Local Plan review that will aim to address this issue.

We agree that the NP only provides for infill, but MAR12 is intended to deal with the real possibility of a larger site coming forward outside the current physical limits

We could not justify a specific numerical threshold but suggest that estate-type developments which will contain planned open spaces and community facilities would normally

be capable of accommodating one or more communal spaces suitable for a growing area, and we propose changing the second sentence of the policy to:-

"In the case of community growing spaces, these will be required within residential developments which are large enough to be planned as an "estate" layout with one or more communal areas, portions of which could be used as growing spaces"

10 Has the QB published any evidence to demonstrate the significance of the sites identified under the new Appendix 2 proposed as non-designated heritage assets? Have the owners been consulted on the proposed designation as non-designated heritage assets? Paragraph 6.25 refers to the remains that are still visible being locally listed and registered with SCDC. Would the LPA confirm the status of assets listed in the proposed new Appendix 2.

The reference to SCDC in para 6.25 should have read Suffolk County Council. The County Council were consulted at the presubmission and submission stages (via their nominated NP liaison officer).

Owners of assets held privately were consulted as part of the normal business and residential consultation. (Max Industrious owns 7 of the buildings and these are all in commercial use). The local volunteer groups and societies involved with land maintenance and conservation of the airfield related assets were also consulted.

Appendix 2 was derived from Suffolk County Council - Monument Full Report for Martlesham Airfield SMR Number MRM 083- MSF 22020 dated 25/3/10. Copy available if required.

Appendix 2 has now been further revised and categorised in line with SCDC guidance criteria (<http://www.eastsuffolk.gov.uk/assets/Planning/Design-and-Conservation/Final-adopted-criteria-of-non-designated-heritage-assets.pdf>) which we hope addresses the last part of your question. (see attached).

The local schools have taken part in organised visits to some of the sites and undertaken projects relating to them.

We suggest adding a note at the top of Appendix 2 as follows:-

"See para 2.4 and 2.5 for background historical context."

11 The County Council has questioned the source of the evidence for figures 7.1 and 7.2. Would the QB confirm the source.

This is based on:-

- *Our own observations*
- *Feedback from residents in the course of normal Parish Council Business*
- *The NP survey*
- *Knowledge gained from transport assessments carried out by potential developers of the BT site in 2011/2 and again in 2017.*

12 There appears to be some text missing from the first line of Policy MAR15. Should this read "within and adjacent to the Martlesham Heath Retail Park"? Would the QB provide a map to show how the area covered by this policy could be shown on the Policies Map. Would the LPA comment on whether it would be feasible and deliverable to require new development proposals to provide or contribute to additional crossing points, given that the problems highlighted are existing problems.

Agreed - insert "adjacent" after "both" in line 1.

It is suggested that the title of this policy be changed to:-

"Cycling, walking and disability access within and adjacent to the Martlesham Heath General Employment area as defined in Para 10 - Policies Map.

This is to reflect the fact that access to the retail area will frequently involve going through the industrial area and vice versa.

We believe these objectives can be met by Section 106 conditions relating to the developer's commitment to deliver sustainable access from the Adastral Park

housing development site to the General Employment Area (including the retail part).

13 It is not clear how the first bullet point of Policy MAR18 is to be applied. Would the LPA and QB comment on the wording proposed in the representations by Planning Potential and Lichfields. Would the following wording be clearer and provide sufficient flexibility? "it has been demonstrated that there are no sites that are suitable or available in or on the edge of a Retail Centre Policy SP9;"

We agree with your suggestion - thank you

14 Will the QB supply a map showing the boundary of the Retail Park covered by Policy MAR18 to be included in the Policies Map. A consequential revision should be shown to the boundary of the employment area.

The area shown in blue on the Policies Map described as General Employment Area includes within it the retail park. The physical boundary between the retail and the rest of the general employment area is not tightly defined, and it was not the intention that the NP would lay down a hard and fast boundary. Rather, it was intended that the LPA and QB would work together to address the evolution of the general employment area as part of the current Local Plan review.

15 Policy MAR19 refers to "Areas" in the plural. Does this policy only relate to the Martlesham Heath Business Park? Is there any reason why the policy should not be entitled "Martlesham Heath Business Park"? It is noted that the Policies Map key incorrectly refers to Policy MAR18.

We suggest changing title of MAR19 to singular. This relates only General Employment Area.

Given that the blue area covers the retail and business parts of the General Employment Area it is suggested that the key for the blue area should say "MAR18 and MAR 19". Also the yellow key should refer to "MAR20".

16 Policy MAR19 incorporates an old form of policy wording and refers to earlier descriptions of the use classes and retail uses as Classes A1 to A3. In view of the current mix of uses on the area to the west of Gloster Road and the car related sui generis uses throughout the business park should the policy be more flexible towards other employment and leisure uses? If so, would the LPA and QB propose a revision to the wording of the policy. Would the LPA comment on whether the second part of Policy MAR19 would be deliverable.

Your comments are noted. It is suggested that to address them MAR19 be re-worded as follows:-

"Unless otherwise stated in the Suffolk Coastal Local Plan, on the General Employment Areas shown in blue on the Policies Map, planning permission will normally be granted for Classes B1 (light industrial), B2 (general industrial) and B8 (warehousing) development so as to maintain a broad range of employment, and to take into consideration the limited capacity of the road network in the immediate vicinity.

The change of use of existing Class B2 and Class B8 floorspace to retail uses (Classes A1- A3) will be resisted. Such changes of use will only be permitted if it has been satisfactorily demonstrated to the LPA that the location has been effectively marketed over a reasonable period of time in accordance with the Suffolk Coastal Commercial Property Marketing Guide dated 12th August 2016 (or subsequent updates). <http://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Supplementary-Planning-Guidance/Marketing-Guidance-for-SCDC-by-Carter-Jonas.pdf>"

17 Policy MAR20 has the same wording as saved Policy AP213 and incorporates an old form of policy wording. Would the LPA and QB comment on the effectiveness of the policy in managing the re-use of buildings in the area. The first section refers to "a comprehensive scheme for the whole complex". Has this been prepared and made publicly available? If not who is responsible for preparing it?

The objectives set out in the saved policy have not been effectively applied to the site in part or as a whole. However the LPA accepts that this needs to be addressed (as does a similar situation on the nearby area around Bridge Farm business area). However the LPA do intend to continue to pursue this policy, and have recommended the following update with respect to Sandy Lane (which the QB strongly supports):-

The following revised wording of MAR20 is proposed:-

Planning permission will be granted for employment development, including re-development or refurbishment of existing buildings on land at Sandy Lane, Martlesham as identified on the Policies Map, provided that:

- The use is restricted to activities falling within Use Classes B1 and B2 or extensions and alterations to established premises and businesses on the site for the continuation of existing activities.*
- It does not harm the AONB setting and any designated heritage assets. New buildings, conversions and external works (including re-cladding) shall be of a high standard and should not detract from the character of the AONB.*
- Does not increase the number of access routes in and out onto Sandy Lane.*
- A transport assessment can demonstrate to the satisfaction of the Highway Authority that the scale and type of traffic generated is acceptable in terms of impact on the local road network.*
- Where possible, improves pedestrian and cycling conditions on Sandy Lane.*
- Supports provision of suitable premises for small businesses."*

18 The first section and first bullet point refers to buildings being retained in the western part of the site and the remainder being removed and the land restored. The eighth bullet refers to the demolition and restoration of the area. The whole area is built up.

Which area is it intended to continue to be built up and which restored? Are these parts of the policy deliverable?

This is removed in the above revision

19 The second bullet refers to buildings being in keeping with the exposed location of the AONB. The third states it should reflect the location in the AONB. How are these bullets to be interpreted given that the buildings and extent of the site have been in existence for some time?

This is removed in the above revision

20 Has bullet point 5 already been implemented? Would it be preferable to state that no additional accesses onto Sandy Lane are to be provided?

This is taken account of in the revised policy above.

21 Does the fourth section permitting only B1 uses set out clear guidance? The area includes buildings with a wider range of uses including the sale of car parts and car repairs.

This is taken account of in the revised policy above.

22 Is the final part of section five preferring businesses providing jobs and services to the local community enforceable?

It has been rephrased to refer to small businesses and reference to local community removed.

23 Would the QB explain what is meant in Table 9.1 by "improve co-ordination between fragmented interests at Martlesham Heath Retail Park and Business Park".

There are are four different landowners and the highways belong to Suffolk County Council. Thus there is no single coordinating body to allow better plan-

ning of parking, pedestrian access etc. However slow progress is starting to made towards this goal and we would like to keep this in the non-policy section of the NP.